

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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SPRINGFIELD LIBRARY AND  
MUSEUM ASSOCIATION, INC.,  
Plaintiff,

v.

KNOEDLER ARCHIVUM, INC.,  
f/k/a M. Knoedler & Company, Inc.  
Defendant.

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Civil Action  
No. 03-CV-30219-MAP

**DEFENDANT’S MOTION FOR LEAVE TO FILE REPLY MEMORANDUM  
IN SUPPORT OF DEFENDANT’S OBJECTIONS TO THE  
MAGISTRATE JUDGE’S REPORT AND RECOMMENDATION  
ON DEFENDANT’S MOTION FOR JUDGMENT ON THE PLEADINGS**

Pursuant to Local Rule 7.1(B)(3), defendant Knoedler Archivum, Inc. (“Knoedler”) moves for leave to file the attached Reply Memorandum in response to Plaintiff’s Opposition to Defendant’s Objections to the Magistrate Judge’s Report and Recommendation on Defendant’s Motion for Judgment on the Pleadings (“Opposition”). As grounds for this motion, Knoedler states that the Opposition mischaracterizes factual issues important to the resolution of the motion and raises novel arguments Knoedler seeks to address in the attached Reply Memorandum.

Respectfully submitted,

/s/ Amy J. Berks

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April 14, 2004

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

I certify that the requirements of Local Rule 7.1(A)(2) were complied with prior to the filing of this motion.

\_\_\_\_\_/s/ Amy J. Berks  
Amy J. Berks